

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
ANTIONETTE BARBER)	Case No. 15-35388-KLP
)	Chapter 13
Debtor)	

**MOTION TO EXPEDITE HEARING ON MOTION
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on October 20, 2015.
2. The Debtor has applied for and Hailey Buick GMC Truck, Inc. has approved a loan to the Debtor in the amount of \$20,000.00 plus interest at 17.99% per annum to be repaid with 72 equal monthly payments of \$400.00 for the purchase of a 2017 Buick Encore or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because Debtor current vehicle is having major mechanical issues and she needs a replacement vehicle to conduct normal daily business. She will be surrendering her current vehicle that was included in her Chapter 13 plan.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.

5. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion, waive the 14-day stay pursuant to Fed. R. Bankr. Proc. 8014(a), and for such other and further relief as is just and proper.

Dated: June 3, 2021

ANTIONETTE BARBER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 16, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: June 3, 2021

ANTIONETTE BARBER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
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/s/ James E. Kane
Counsel for Debtor

Label Matrix for local noticing

0422-3

Case 15-35388-KRH

Eastern District of Virginia

Richmond

Thu Jun 3 16:43:43 EDT 2021

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

(p)JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

Internal Revenue Service

Centralized Insolvency Operation

P. O. Box 7346

Philadelphia, PA 19101-7346

UST smg Richmond

Office of the U. S. Trustee

701 East Broad St., Suite 4304

Richmond, VA 23219-1849

ARM

PO Box 129

Thorofare, NJ 08086-0129

Aarons, Inc.

P.O. Box 102746

Atlanta, GA 30368-2746

Aldous & Associates

PO Box 171374

Holladay, UT 84117-1374

Alliance One

Attn: Bankruptcy

Po Box 2449

Gig Harbor, WA 98335-4449

American Credit Accept

961 E Main St

Spartanburg, SC 29302-2185

Approved Cash Advance

6341 Jahnke Road

Richmond, VA 23225-4142

CJW Medical Center

PO Box 740760

Cincinnati, OH 45274-0760

Capital One

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.

PO Box 71083

Charlotte, NC 28272-1083

Cash 2 U Financial Services of VA LLC

6100 Midlothian Turnpike

Richmond, VA 23225-5922

Cash 2 U Payday Loans

6100 Midlothian Tnpk

Richmond, VA 23225-5922

Check City

2729 B West Broad Street

Richmond, VA 23220-1905

City of Richmond

Office of Finance

PO Box 26505

Richmond, VA 23261-6505

City of Richmond

Parking Enforcement

PO Box 26505

Richmond, VA 23261-6505

City of Richmond - City Hall

Room 109 Delinquent Taxes

900 East Broad Street

Richmond VA 23219-1907

City of Richmond - Dept. of Public Utilities

730 E. Broad Street, 5th Floor

Richmond, VA 23219-1861

Constance Ford

1321 Dance Street

Richmond, VA 23220-6116

Credit Collection Services

Two Wells Avenue

Dept. 9136

Newton Center, MA 02459-3225

Department of the Treasury

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

ESM Enterprises

PO Box 11128

Pensacola, FL 32524-1128

Fed Loan Serv

Po Box 60610

Harrisburg, PA 17106-0610

First Premier Bank

601 S Minnesota Ave

Sioux Falls, SD 57104-4868

First Virginia

PO Box 4115

Concord, CA 94524-4115

Golds Gym

c/o Conexion

PO Box 72609

Rosedale, MD 21237-8609

Internal Revenue Service

Centralized Insolvency Operation

Philadelphia, PA 19101-7346

LVNV Funding, LLC
P.O. Box 10497
Greenville, SC 29603-0497

LVNV Funding, LLC its successors and assigns
assignee of MHC Receivables, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

MCV Collection Department
PO Box 980462
Richmond, VA 23298-0462

MCV HOSPITAL
P O BOX 980462
RICHMOND, VA 23298-0462

MCV Physicians
PO Box 91747
Richmond, VA 23291-9747

Midland Credit Management Inc as agent for
Midland Funding LLC
PO Box 2011
Warren MI 48090-2011

National Credit Adjust
Po Box 3023
Hutchinson, KS 67504-3023

Navient Solutions, LLC. on behalf of
Educational Credit Management Corporatio
PO BOX 16408
St. Paul, MN 55116-0408

Oakhurst Manor LP
20 S. Auburn Ave.
Richmond, VA 23221-2910

Parrish & Lebar
5 East Franklin Street
Richmond, VA 23219-2105

Premier Bankcard, Llc
c o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Progressive Advanced Insurance
PO Box 55126
Boston, MA 02205-5126

Protas, Spivok & Collins
4300 East West Highway
Suite 900
Bethesda, MD 20814-4433

Receivable Management
7206 Hull Street Rd Ste
North Chesterfield, VA 23235-5826

Richmond Finance Company
12560 PATTERSON AVENUE
Henrico, VA 23238-6412

Richmond Finance Company
PO Box 29657
Richmond, VA 23242-0657

South Slope Associates
3951-A STILLMAN PKWY
Glen Allen, VA 23060-0000

Taxing Authority Consulting Sv
PO Box 31800
Henrico, VA 23294-1800

(p)ROBERT P MCINTOSH
U S ATTORNEY S OFFICE
EASTERN DISTRICT OF VIRGINIA
919 E MAIN ST SUITE 1900
RICHMOND VA 23219-4625

Virginia Commonwealth Univer.
700 West Grace Street
Suite 3300
Richmond, VA 23284-9091

Virginia Commonwealth University
VCU
700 West Grace Street, 3rd Fl. Ste 3300
PO Box 843054
Richmond, VA 23284-3054

Wells Fargo Bank
Box 5058 MAC P6053-021
Portland, OR 97208-5058

Wells Fargo Bank
PO Box 13765
Roanoke, VA 24037-3765

West Creek Financial
PO Box 5518
Glen Allen, VA 23058-5518

Antionette Barber
2712 Grantwood Court
Richmond, VA 23225-1543

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Suzanne E. Wade
341 Dial 877-996-8484 Code 2385911
7202 Glen Forest Drive, Ste. 202
Richmond, VA 23226-3770

End of Label Matrix
Mailable recipients 56
Bypassed recipients 0
Total 56